

BEFORE THE

Federal Communications Commission

WASHINGTON, D. C. 20554

ORIGINAL
FILE

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In the Matter of)

Amendment of Section 73.202(b))

Table of Allotments)

FM Broadcast Stations)

(Tarkio, Missouri))

Federal Communications Commission
Office of the Secretary

RM

MM Docket No.

TO: Policy and Rules Division
Mass Media Bureau

PETITION FOR RULE MAKING AND
REQUEST FOR MODIFICATION OF LICENSE

KANZA, Inc. ("KANZA"), licensee of Station KTRX(FM), Tarkio, Missouri, by its attorney and pursuant to Section 1.401 of the Commission's Rules, hereby respectfully requests: (a) that the FM Table of Allotments be amended to substitute Channel 228C3 in lieu of Channel 228A at Tarkio, Missouri; and (b) that KANZA's license for Station KTRX(FM) be modified, pursuant to Section 316(a) of the Communications Act of 1934, as amended, and Section 1.420(g) of the Commission's Rules, to specify operation on Channel 228C3 in lieu of Channel 228A. In support whereof, the following is shown:

As demonstrated in the attached Engineering Statement prepared by Owl Engineering, Inc., KANZA's engineering consulting firm, Channel 228C3 can be assigned to Tarkio in full compliance with the Commission's minimum distance separation requirements, subject to a 17.5 kilometer site restriction to the northeast of Tarkio.

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KANZA submits that the upgrading of Station KTRX(FM) would be in the public interest. Operating with Class C3 facilities, the Station would serve a larger population and area than is currently served. KANZA hereby represents that it will proceed to construct Class C3 facilities in accordance with the terms of the Commission's authorization therefor.

Section 1.420(g) of the Commission's Rules provides that in response to a petition for rulemaking filed by a licensee of an FM station to allot a mutually exclusive higher class co-channel FM channel to its proposed community of license, the Commission may modify the petitioner's license to specify operation on the newly allotted channel.

WHEREFORE, for the reasons discussed above, it is respectfully requested that the FM Table of Allotments, Section 73.202(b) of the Commission's Rules, be amended as follows:

<u>City</u>	<u>Delete Channel No.</u>	<u>Add Channel No.</u>
Tarkio, Missouri	228A	228C3

It is further respectfully requested that KANZA's license for Station KTRX(FM) be modified to reflect operation on Channel 228C3 at the time this Channel is added to the FM Table of Allotments.

Respectfully submitted,

KANZA, INC.

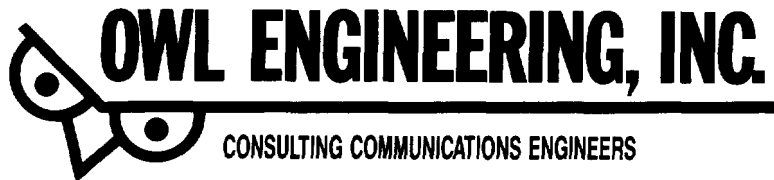
By: John R. Wilner

John R. Wilner

Its Attorney

Bryan Cave
700 Thirteenth Street, N.W.
Suite 600
Washington, D.C. 20006-3960

May 1, 1992



CONSULTING COMMUNICATIONS ENGINEERS

1306 W. County Road F, St. Paul, MN 55112
(612) 631-1338 • Fax (612) 631-3502

**ENGINEERING STATEMENT ON BEHALF OF
KANZA, INC.
IN SUPPORT OF A PETITION TO AMEND
THE FM TABLE OF ALLOTMENTS
CHANNEL 228C3 TO TARKIO, MISSOURI**

April 29, 1992

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Owl Engineering, Inc. has been retained by KANZA, Inc. (hereafter KANZA) to prepare this Engineering Statement in support of a petition to amend the FM Table of Allotments, FCC Rules Section 73.202(b) as follows:

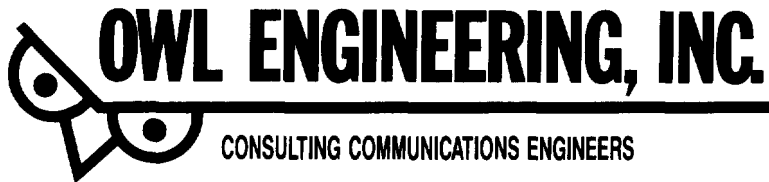
<u>Location</u>	<u>Present</u>	<u>Proposed</u>
Tarkio, MO	228A	228C3

The reference coordinates used for this study are:

40 33' 50" North Latitude
95 15' 00" West Longitude

A full class C3 facility operating from the proposed site coordinates will provide 60 dBu (1 mV/m) signal coverage to the population encompassed by an area of approximately 4,773 square kilometers. Tarkio has a population of 2,243 based on 1990 U.S. Census data.

The proposal of KANZA was evaluated to determine if the proposed site coordinates would meet FCC spacing requirements. That analysis is attached as Engineering Exhibit E-1. As can be seen from exhibit E-1, KANZA's proposal meets all FCC spacing requirements set forth in section 73.207 of the FCC Rules. The reference coordinates proposed by KANZA represent a 17.5 kilometer site restriction to the north east. There is a large area in which to select a suitable transmitter site.



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The proposal of KANZA was evaluated to determine if the proposed site would meet FCC signal coverage requirements. The distance from the reference coordinates to the city of Tarkio is 17.5 kilometers at a bearing 218.1 degrees. The three to sixteen kilometer average terrain was computed using the NGDC data base and the distance to contours was computed using the FCC F(50,50) metric curves. The distance to the 70 dBu contour along the radial through the principle city was calculated to be 24.8 kilometers, surpassing the city by some 7.3 kilometers. Engineering Exhibit E-2 shows the 70 dBu contour plotted and demonstrates that the entire city of Tarkio of served by a signal strength of 70 dBu or greater. Clearly, the proposal of KANZA meets the requirements of FCC Rules section 73.315.

A comparison of the area/population served by the 60 dBu coverage contour of the higher class channel to the present class A facilities was completed. Utilizing the reference Height Above Average Terrain (HAAT) and Effective Radiated Power (ERP) for each class of station, the following data was calculated:



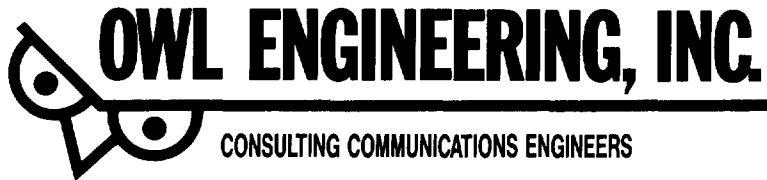
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Station Class	Area Served km ²	Population Served (1990 Census)
C3	4,773	37,421
A	2,506	11,796

Based on the above calculations, it can be determined that the proposed class C3 facilities will increase the area served by 90 percent and the population served by 217 percent.



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Based on the engineering studies provided, the following conclusions can be obtained:

1. The proposal will provide Tarkio with a full time regional broadcast service.
2. The proposal will meet the requirements of FCC Rules Section 73.315.
3. The proposal will meet the requirements of FCC Rules Section 73.207.
4. The proposal will increase the area served by 90 percent.
5. The proposal will increase the population served by 217 percent.



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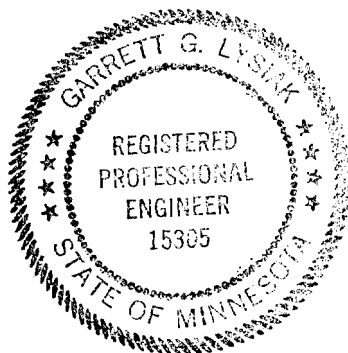
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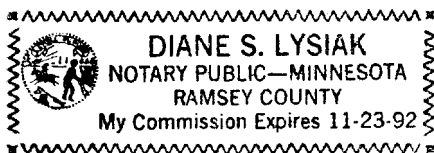
RAMSEY COUNTY)
)
STATE OF MINNESOTA) ss:

Garrett G. Lysiak, being first duly sworn, says that he is president of Owl Engineering, Inc., consulting communications engineers with offices in Arden Hills, Minnesota; that his qualifications as an expert in communications engineering are a matter of record with the Federal Communications Commission; that the foregoing exhibit was prepared by him and under his direction; and that the statements contained therein are true of his own personal knowledge except those stated to information and belief and, as to those statements, verily believes them to be true and correct.



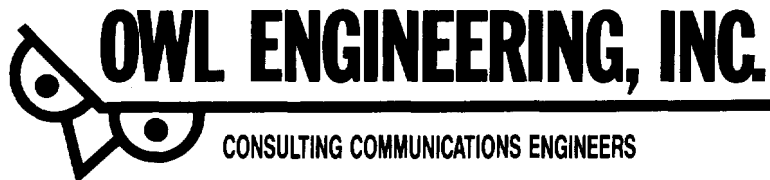
Garrett G. Lysiak, P.E.

Subscribed and sworn to before me this date April 22, 1992



Diane S. Lysiak
Notary Public

My commission expires November 23, 1992



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**ENGINEERING EXHIBIT E-1
KANZA, INC.
IN SUPPORT OF A PETITION TO AMEND
THE FM TABLE OF ALLOTMENTS
CHANNEL 228C3 TO TARKIO, MISSOURI**

FM Channel 228-C3

LATITUDE: 40° 33' 50"
LONGITUDE: 95° 15' 0"

CHNL Call	City	Class	Calculated Km.	Required Km.	Delta km.	Bearing °
282	NO CONFLICT					
281	NO CONFLICT					
225	NO CONFLICT					
226	NO CONFLICT					
227	FAIA Des Moines	C	191.73	176	15.73	51.10
227	FAMO Kansas City	C	183.29	176	7.29	159.51
227 KRRK	FMNE Bennington	A	105.15	89	16.15	321.81
227 KIOAFM	FMIA Des Moines	C	191.73	176	15.73	51.10
227 KMXV	FMMO Kansas City	C	183.29	176	7.29	159.51
227	FANE Bennington	A	117.13	89	28.13	319.83
228	FANE Columbus	C1	231.37	211	20.37	298.86
228 KWMG	FMNE Columbus	C1	231.27	211	20.27	298.87
229 KKRL	FMIA Carroll	C1	168.28	144	24.28	10.31
229	FRKS Horton	C3	104.18	99	5.18	182.68
229	FAIA Carroll	C1	168.28	144	24.28	10.31
229	FRKS Atchinson	A	100.19	89	11.19	179.01
229	FRKS Wathena	A	88.72	89	-0.28	163.53
230	NO CONFLICT					
231 WOWFM	FMNE Omaha	C	105.15	96	9.15	321.81
231	FANE Omaha	C	105.15	96	9.15	321.81

